REMARKS

Applicants thank the Examiner for the careful consideration of the subject application.
The Office Action mailed September 15, 2008 has been carefully considered. In this Office
Action Claims 1-14 are rejected and Claims 1-14 remain pending. Claims 1-14 were rejected
under 35 USC 112 as being indefinite. Claims 1-14 were rejected under 35 USC 102. Claims 1
and 8 were amended with the filing of this response. No new matter was added with the filing of
this response and the amendments are supported, at least, by the application at page 19 lines 5-7
and Figure 6 and Page 12 lines 18-20, and Page 13 lines 1-7. Applicants respectfully request
reconsideration, removal of the rejections, and that the application be placed in condition for
allowance based on the amendments and the arguments herein.

Rejections under 35 USC 112

The Office Action rejected Claims 1-14 are being indefinite under 35 USC 112.
Specifically, Claims 1-4 were rejected as indefinite because the Office Action stated that support
was not found for the term "source storage system." With respect to this phrase Applicants
would respectfully direct attention to the last paragraph of page 13 of the instant application
which states:

The simulation system or tool 114 may be used to determine the feasibility of consolidating a number of
storage systems to fewer or newer data storage system units, this is sometimes referred to as a "merge" operation.
The tool is useful for examining and calculating the utilization of components within the system to be consolidated
or merged, such a system may be referred to as a **source** for a consolidating or merging operation.

Applicants would respectfully assert that this paragraph provides adequate support for the
term "source storage system" and would respectfully request that this rejection be withdrawn.

Rejections under 35 USC 102

The Office Action rejected Claims 1-14 under 35 USC 102 in light of Friedrich (US

Patent No. 5,276,877). While Applicants assert that Friedrich does not anticipate the claimed

invention, Applicants have amended Claims 1 and 8 to more clearly claim the current invention.

Applicants assert that Friedrich does not have each and every element of the amended claims

which is necessary for a 35 USC 102 rejection.

Friedrich, column 2 lines 53-56, states his method is directed to "display of a computer

system's configuration along with elected system metrics." Friedrich states, column 2, lines 61-

65, that he provides a "[m]ethod of evaluating the performance of a computer system described

by a configuration representing physical devises, the connections of the physical devices in the

computer system, and workloads which are process that use system resources provided by the

physical devises." Further, at Column 3, lines 14-16, Friedrich states that his invention is "for

use in modeling a computer system containing a plurality of physical devises supporting a

plurality of workloads. . ." Friedrich also states his computer system "contains two busses, NI

bus 103 and CI bus 106," "CPUs" and "HSC (hierarchical storage controller) 140 manages

communications between disks and CI bus."

However, Applicants respectfully assert that Friedrich does not disclose Claim 1 or Claim

8 as Friedrich does not disclose a "data storage system comprising front end controllers coupled

to a cache memory and a back end coupled to the cache, the back end comprising back end

controllers coupled to a plurality of storage components." The Office Action seems to agree

with this assertion as it stated the "target data storage system comprising a plurality of storage

components" was equivalent to "each of the CPU's being simulated including their attached

disks." However, Applicants respectfully assert that Friedrich does not disclose "front end

controllers" and a "back end" where "the back end comprising back end controllers coupled to a

plurality of storage components. Further, as Applicants assert that Friedrich does not disclose a

"back end," Friedrich can not disclose "optimizing the backend end of the target storage system."

Friedrich does not contain all of the claimed elements of the current invention and

Applicants assert it can not be used as a proper 35 USC 102 rejection. First, Friedrich is directed

to "modeling a computer system containing a plurality of physical devises supporting a plurality

of workloads." Applicants assert this suggests that Friedrich discloses a computer. Disclosing

only a computer for his "modeling," Applicants assert Friedrich does not disclose, at least "[a]

data storage system comprising front end controllers coupled to a cache memory and a back end

coupled to the cache, the back end comprising back end controllers coupled to a plurality of

storage components."

Therefore, Applicants respectfully assert that Friedrich does not disclose all the elements

of Claims 1 and 8. Not disclosing all of the elements of the claimed inventions, Applicants

assert that Friedrich can not properly be used for a 35 USC 102 rejection. Consequently,

Applicants respectfully request this rejection be removed and Claims 1 and 8 be placed in

condition for allowance. As Claims 2-7 and 9-14 depend on Claims 1 and 8, Applicants assert

that Claims 2-7 and 9-14 should be allowable for at least the same reasons.

Conclusion

In view of the foregoing, the Applicants believe that the application is in condition for

allowance and respectfully request favorable reconsideration.

In the event the Examiner deems personal contact desirable in the disposition of this case,

the Examiner is invited to call the undersigned attorney at (508) 293-7450.

Please charge all fees occasioned by this submission to Deposit Account No. 05-0889.

Respectfully submitted,

Dated: November 17, 2008   /Joseph D'Angelo/
                                     Joseph D'Angelo (Reg. No. 56,800)
                                     Attorney for Applicants
                                     EMC Corporation
                                     Office of General Counsel
                                     176 South Street
                                     Hopkinton, MA 01748
                                     Telephone: (508) 293-7450
                                     Facsimile: (508) 293-7189